



City of Huntington Beach

2000 Main Street ♦ PO Box 190 ♦ CA 92648

Travis K. Hopkins, PE
Director

Department of Public Works
(714) 536-5431

April 18, 2012

Submitted via email: commentletters@waterboards.ca.gov



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comments on the proposed Ocean Plan Amendment of the Water Quality Control Plan for Ocean Waters of California – Designating State Water Quality Protection Areas to protect State Marine Protected Areas

Dear Ms. Townsend:

The City of Huntington Beach (City) appreciates the opportunity to comment on the proposed Ocean Plan Amendment of the Water Quality Control Plan for Ocean Waters of California – Designating State Water Quality Protection Areas to protect State Marine Protected Areas, dated February 23, 2012. The City has reviewed comment letters provided by the County of Orange dated April 18, 2012, the City of Dana Point dated April 17, 2012, and the California Stormwater Quality Association and concurs with their comments. Additionally, the City would like to emphasize the following comments:

- Page 1, Section C.2 of the 2009 Ocean Plan specifies that enclosed bays, estuaries, and inland waters are excluded from the jurisdiction of the Ocean Plan. The proposed amendment references a number of MPAs that are estuaries suggesting that these may be subject to future SWQPA-GP designation. The proposed amendment should respect the exclusion of enclosed bays, estuaries, and inland waters and proposed Section E (1) (a) (2) should be revised to read: "SWQPA-General Protection (GP) designated by the State Water Board to protect water quality within Marine Protected Areas (MPAs), but excluding those in enclosed bays and estuaries, that require protection under the provisions described under section 5 below." Likewise, the definition of SWQPA-GP in Appendix I should be revised to add "excluding those in enclosed bays and estuaries" at the end of the definition.
- The requirement for universal diversion of dry weather discharges to Publicly Owned Treatment Works (POTWs) has many constraining factors that require analysis.

Thank you again for the opportunity to provide comments. If you have any questions, please contact Terri Elliott at 714-536-5431.

Sincerely,

Travis K. Hopkins, PE
Director of Public Works

TKH/TE:jg